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BLOOD HURST & O'REARDON, LLP  
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(*Applicant for pro hac vice admission*)  
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*Attorneys for Jun Dam and the Class in  
Dam v. Perkins Coie, LLP, et al.,  
Case No. 2:20-cv-00464-SAB (E.D. Wash.)*

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON**

In re:

GIGA WATT, INC., a Washington  
corporation,

Debtor.

Case No: 18-03197 FPC 7

Hon. Frederick P. Corbit  
Chapter 7

Adv. Proc. 21-80053

**DECLARATION OF LESLIE E.  
HURST IN SUPPORT OF MOTION  
TO ADMIT *PRO HAC VICE***

**[No Hearing Requested]**

1 I, Leslie E. Hurst, under penalty of perjury, declare the following  
2 statements to be true and correct, based on my personal knowledge and  
3 information:

4 1. I am a member of Blood Hurst & O'Reardon, LLP, and one of the  
5 attorneys of record for Jun Dam, creditor in the bankruptcy proceeding and  
6 defendant in an adversary action.

7 2. I make this declaration in support of the motion for my admission to  
8 practice *pro hac vice* before this Court for the limited purpose of this litigation.

9 **A. Applicant's address and telephone number**

10 Blood Hurst & O'Reardon, LLP  
11 501 West Broadway, Suite 1490  
12 San Diego, CA 92101  
Tel: (619) 338-1100

13 **B. Dates of admission to practice before other courts**

14 I am admitted to practice in the following courts:

- 15 • California Supreme Court (12/6/1995)
- 16 • United States District Courts for the S.D. California (10/25/1996),  
17 C.D. California (10/25/1996), N.D. California (11/11/1996),  
18 E.D. California (5/08/2014)
- 19 • United States Appellate Courts for the Second (10/20/17), Sixth  
20 (1/06/2015), Seventh (8/29/2019); Eighth (11/19/2017), and Ninth  
21 (10/31/2011) Circuits

22 **C. Name, address and telephone number of associated admitted  
23 counsel**

24 Dennis McGlothin (WSBA No. 28177)  
25 Western Washington Law Group PLLC  
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**D. Necessity for appearance by applicant**

I am a member of Blood Hurst & O'Reardon, LLP and specialize in class action litigation. I will be primarily responsible for two of the appeals arising from this action, 2:21-cv-00291-SAB and 2:22-cv-00040-SAB, Adversary Proceeding 21-80053. I am informed and believe that to represent and appear in the appeals from the bankruptcy proceedings requires my admission *pro hac vice* in the bankruptcy proceeding.

**E. Disciplinary actions or sanctions**

I have no pending disciplinary sanction or actions and have never been subject to disciplinary sanctions by any court or Bar Association.

I declare under penalty of perjury under the laws of the United States of America and the state of Washington, that the foregoing is true and correct.

Respectfully submitted on April 11, 2022.

*s/ Leslie E. Hurst*

Leslie E. Hurst (CA 178432)  
*Applicant for pro hac vice admission*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on April 11, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will in turn automatically generate a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF System. The NEF for the foregoing specifically identifies recipients of electronic notice.

Executed on April 11, 2022.

*s/ Dennis McGlothlin*

DENNIS J. McGLOTHIN